

EXHIBIT A

SJ

Seth >

We LOVE it. It's a treat to do trash stuff after hard work like SH. I've been in contact with some environmental Lawyers about the big cable. And they are optimistic it will get removed and ATT will be forced to pay... They asked what we wanted... as in what we personally wanted to sue them for. I thought that was silly. But I guess it's a thing. Anyways we told him our only interest is getting it removed. I told them our desire to clean as much as we can of the whole lake and he thought they could take on ATT as people of CA against ATT and have them setup a mitigation fund to help fund trash removal in Tahoe for the damage they have caused over time. That

+ iMessage



 SJ

Seth >

it's a thing. Anyways we told him our only interest is getting it removed. I told them our desire to clean as much as we can of the whole lake and he thought they could take on ATT as people of CA against ATT and have them setup a mitigation fund to help fund trash removal in Tahoe for the damage they have caused over time. That would be very exciting! But not sure it's realistic or when. I'm sure that would take years... but gives me hope!

WOW—that's huge! Gives me hope too! We're at the tip of the iceberg and all these photos and stories are going to be key to get there-

 + iMessage 

EXHIBIT B

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Telephone Company to Remove Toxic Underwater Cable from Lake Tahoe

Pacific Bell ordered to remove 8 miles of lead-leaching abandoned telecom lines discovered by nonprofit

SOUTH LAKE TAHOE, CA – Eight miles of leaded cable weighing an approximated 150,000 pounds was abandoned at the bottom of Lake Tahoe decades ago by AT&T's Pacific Bell Telephone Company. Below the Blue, a local nonprofit that is dedicated to removing foreign debris and investigating pollution problems, brought attention to the cable in 2020, and has been working diligently with PacBell's parent company to get the cable removed ever since.

Below the Blue is supportive of the recent settlement approved in federal court between the California Sportfishing Protection Alliance (CSPA) and Pacific Bell. As part of the agreement AT&T has agreed to remove the leaded telecommunications cable by 2022 as well as cover all costs for permitting and proper disposal.

The cable has been leaching toxic lead into the lake for decades. PacBell switched to fiber optic phone cables over 30 years ago and abandoned the old cables at the bottom of the lake. The cables contain approximately 3 pounds of lead per foot, and extend for 8 miles along the western shore of Lake Tahoe from Baldwin Beach to Rubicon Bay, including across the mouth of Emerald Bay. While removing trash from the bottom of the lake, founders of Below the Blue Seth Jones and Monique Rydel Fortner discovered the cables and brought it to the attention of CSPA.

The magnitude and impact of the cable cannot be understated. The discovery of the cable inspired the foundation of Below the Blue. As confirmed in the settlement, PacBell stopped using the cables over thirty years ago. Over several years, Jones and Fortner have been conducting independent investigations and followed the cable's underwater and above ground paths.

Signage dates to the original use of the cables as early as the 1930s. Testing has confirmed the presence of lead, with conservative estimates of over 60 tons. At the time of placement of the cables, long-term impacts of such metals in water was not well understood.

“Now that the risks of such contamination are known, it is unfathomable to continue exposing Lake Tahoe’s residents and millions of visitors to potential harm,” said Fortner.

Over the past decade, Jones and Fortner have performed thousands of dives in Lake Tahoe to remove foreign debris and raise awareness around pollution. Commercial, industrial and personal waste has been left undisturbed at the bottom of and throughout Lake Tahoe. Below the Blue is committed to slow the pace of pollution and be part of a growing movement around the Lake Tahoe Basin to remove debris from the lake and surrounding tributaries.

“This situation has been an exceptional example of what is possible when groups come together to make a positive impact. The settlement is a step in the right direction, but the risks to the environment won’t be mitigated until the cables are out,” said Fortner. “The hope is that a continuing partnership between all those involved will make removal and disposal a reality.”

Below the Blue has worked with local agencies, community organizations, the scientific community, and environmental lawyers in a collective effort to address this environmental and conservation issue. The local community, in particular the homeowners of Rubicon Bay, joined in the efforts to solicit for change. AT&T’s commitment to making a tangible impact is welcomed in spite of the original placement of the cables decades ago. Their leadership should be commended, and their respect for the local Lake Tahoe community acknowledged.

The settlement requires PacBell to begin the process of obtaining permits from state and local agencies to remove the cables. Afterwards, PacBell will put the removal process out for bid. If the permitting imposes conditions that push bids beyond \$1.5 million, CSPA and AT&T will need to reassess and avoid further litigation.

“Lake Tahoe is one of California’s iconic waterways,” said CSPA executive director Bill Jennings, “We are proud to provide this push to get toxic garbage out of the Lake.” In addition to CSPA, countless other organizations have positively influenced the situation, including the League to Save Lake Tahoe. The League, better known by their iconic slogan Keep Tahoe Blue, has a successful track record of solving tough environmental challenges at Tahoe. “We will continue to work with Below the Blue as watchdogs to make sure AT&T, Tahoe’s permitting agencies and others work together collaboratively to get the cables out of the lake as soon as possible,” said Jesse Patterson, Chief Strategy Officer for the League. “What’s crucial is getting the lead out of the water to avoid any further damage to our Jewel of the Sierra.”

Below the Blue is a registered 501(c)3 nonprofit dedicated to removing foreign debris from water bodies and to educating the public about the concerns surrounding pollution. Below the Blue collects hands-on data that helps facilitate policy change and enforcement while working closely with a team of environmental lawyers, local agencies and residents.

EXHIBIT C

TRAVEL

Pac Bell will remove old lead-leaching phone cables from Lake Tahoe

By **Gregory Thomas**, Travel & Outdoors Editor

Updated Nov 12, 2021 11:34 a.m.



Old telephone cables on the bottom of Lake Tahoe have been left in disrepair.

Pacific Bell will remove nearly 8 miles of abandoned underwater telephone cables that have been leaching toxic lead into Lake Tahoe, according to a settlement agreement reached last week in federal court.

For decades, the telecommunications company that is now Pacific Bell, a subsidiary of AT&T, has used a network of copper cables strung across Tahoe's lakebed for its phone and internet services. Some of those old telephone cables, sheathed in lead, were installed as early as the 1920s and subsequently abandoned, according to a civil lawsuit filed in January. For at least 30 years, two inoperable cables containing 137,000 pounds of lead sheathing have been discharging contaminants into Lake Tahoe — a violation of state and federal law, according to the lawsuit, filed by the California Sportfishing Protection Alliance.

“There has been thousands of pounds of lead leaching into Tahoe that no one knows about,” said Seth Jones, a South Lake Tahoe resident who discovered the cables.

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Lake Tahoe has fallen to an alarmingly low level. Here's what the impact could be



Jones has conducted underwater scientific work in Tahoe for nearly a decade through his company, Marine Taxonomic Services. He uncovered the old cables in 2012 while on assignment to remove invasive Asian clams from the bottom of Emerald Bay. On their days off, Jones and his crew of scuba divers would collect sunken garbage from the lake. One day, they encountered a thick cable extending hundreds of feet along the silty bottom that appeared to be in disrepair.

“We were like, oh, this is odd,” Jones said.

Jones enlisted the help of telephone infrastructure experts who traced the history of the cables. He also arranged to run tests on a length of cable retrieved from the lake, which showed that it contained more than 3 pounds of lead per foot and was discharging harmful chemicals into the water.

Lake Tahoe's water is considered some of the clearest and purest in the country, and the lake is a source of drinking water for some nearby households in California and Nevada, including those in the Reno area.

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“Lake Tahoe is a vital source of drinking water to surrounding communities,” Jimena Díaz Leiva, science director at the Center for Environmental Health, an Oakland nonprofit focusing on public health issues related to toxic chemicals, said Wednesday in a statement announcing the settlement agreement. “These lead cables must be cleaned up to prevent any further lead leaching into the water. Even low concentrations of lead can have harmful health effects on vulnerable populations like children.”

When ingested, lead can cause cancer in humans and disrupt our reproductive systems; it is harmful to wildlife as well.

Jones and the sportfishing alliance raised the issue with Pac Bell in letters mailed to the company last year. The alliance followed up with a legal complaint in January.

The lawsuit focuses on a pair of old cables in the Emerald Bay area along Tahoe’s West Shore. One is a 7-mile-long telephone line extending from Baldwin Beach to Rubicon Bay. The other is a half-mile length of phone line that is severed at both ends and at rest across the mouth of Emerald Bay.

“Boat anchors and debris have torn into parts of the cables, exposing the lead sheathing that was originally designed to protect the copper strands from contact with water,” according to the lawsuit.

Pac Bell had installed newer cables “at some point in the past” but didn’t extract the old ones, leaving them to decay in the lake, according to the lawsuit. The company claimed in legal filings that it had not operated the cables since the 1980s and no longer owned them.

In a statement to The Chronicle, AT&T said it conducted its own tests of the cables, didn’t find any lead contamination and was “disappointed to see the alliance take such an adversarial posture after we have agreed to work with them to remove these cables.”

“We are committed to preserving one of the most scenic freshwater lakes in the Sierra Nevada,” the company said. “We have agreed to remove these cables because they are no longer in use, however, we dispute any notion that they were a source of pollution.”

Last week, the sportfishing alliance and Pac Bell reached an agreement by which the company will remove the cables without admitting liability for any harm they may have caused. Pac Bell is allocating \$1.5 million for removal. It is unclear how long it will take to gain the necessary permits and authorization to extract them. Jones hopes it will happen by next winter.

“We really appreciate Pac Bell stepping up after we brought this to their attention,” Jones said.

Jones says he has seen other cables in the Emerald Bay area he suspects are also defunct and hopes to get them removed as well.

“They’re continuing to leach lead every day that they’re in the lake so we need to act swiftly,” he said.

EXHIBIT D

WEATHER ALERT

Heat Advisory: Carquinez Strait and Delta, Central Sacramento Valley, Motherlode, Northeast Foothills/Sacramento Valley, Northern San Joaquin Valley, ...

LOCAL NEWS

Pacific Bell ordered to remove miles of lead-leaching telephone cables from Lake Tahoe

by: [Connor Malone](#)

Posted: Nov 19, 2021 / 07:21 PM PST

Updated: Nov 20, 2021 / 08:14 AM PST

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SOUTH LAKE TAHOE, Calif. (KTXL) — AT&T's Pacific Bell company has been ordered to remove roughly 8 miles of abandoned telecommunication lines discovered at the bottom of Lake Tahoe.

A court settlement between the company and the California Sportfishing Protection Alliance ended with Pacific Bell agreeing to remove the leaded cables and cover all costs for permitting and proper disposal.

The lines, discovered by divers and brought to authority's attention by local nonprofit Below the Blue in 2020, had been abandoned by the company over 30 years ago.

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The cables have been leaching toxic lead into the lake for decades, the nonprofit said in a statement Friday. Numerous tests have confirmed the presence of lead — about 3 pounds per foot, extending 8 miles from Baldwin Beach to Rubicon Bay — totaling over 60 tons of the heavy metal.

The nonprofit said the discovery of the cables is what led to the organization's founding in the first place. Two of its founders, Seth Jones and Monique Rydel Fortner were the first to discover the cables since their abandonment.

Thousands of giant sequoias killed in California wildfires >

The cables date back to the 1930s and were in use until the early 1990s, when Pacific Bell switched to fiber optic cables. The leaded cables were left behind.

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At the time they were first laid, Below the Blue said the hazards of lead leaching into water was less-understood. Nowadays that's far from the case.

"Now that the risks of such contamination are known, it is unfathomable to continue exposing Lake Tahoe's residents and millions of visitors to potential harm," Jones said.

Jones and Fortner said they have performed thousands of dives in Lake Tahoe to remove foreign objects and raise awareness of pollution in the lake. Commercial and industrial waste is known to be resting on the lakebed.

"The settlement is a step in the right direction, but the risks to the environment won't be mitigated until the cables are out," said Fortner. "The hope is that a continuing partnership between all those involved will make removal and disposal a reality."

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EXHIBIT E

Timesheet Details

Case 2:21-cv-00073-JDP Document 161-1 Filed 11/06/24 Page 17 of 24

Category	Billable Rate	Billable Amount	Time (hrs)
Melrose (USD)	\$85,269.15		
Monique Rydel Fortner		\$35,476.15	258.95
08 Jan 2024			
Project Management	\$137.00	\$1,644.00	12.00
09 Jan 2024			
Project Management	\$137.00	\$1,781.00	13.00
10 Jan 2024			
Project Management	\$137.00	\$205.50	1.50
11 Jan 2024			
Project Management	\$137.00	\$274.00	2.00
12 Jan 2024			
Project Management	\$137.00	\$308.25	2.25
16 Jan 2024			
Project Management	\$137.00	\$650.75	4.75
17 Jan 2024			
Project Management	\$137.00	\$616.50	4.50
19 Jan 2024			
Project Management	\$137.00	\$513.75	3.75
21 Jan 2024			
Project Management	\$137.00	\$137.00	1.00
22 Jan 2024			
Project Management	\$137.00	\$171.25	1.25
23 Jan 2024			
Project Management	\$137.00	\$61.65	0.45
24 Jan 2024			
Project Management	\$137.00	\$205.50	1.50
25 Jan 2024			

Project Management	\$137.00	\$376.75	2.75
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27 Jan 2024

Project Management	\$137.00	\$239.75	1.75
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28 Jan 2024

Project Management	\$137.00	\$102.75	0.75
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29 Jan 2024

Project Management	\$137.00	\$239.75	1.75
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30 Jan 2024

Project Management	\$137.00	\$1,575.50	11.50
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31 Jan 2024

Project Management	\$137.00	\$1,644.00	12.00
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01 Feb 2024

Project Management	\$137.00	\$1,918.00	14.00
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02 Feb 2024

Project Management	\$137.00	\$1,712.50	12.50
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03 Feb 2024

Project Management	\$137.00	\$993.25	7.25
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04 Feb 2024

Project Management	\$137.00	\$924.75	6.75
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05 Feb 2024

Project Management	\$137.00	\$1,815.25	13.25
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06 Feb 2024

Project Management	\$137.00	\$2,013.90	14.70
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07 Feb 2024

Project Management	\$137.00	\$513.75	3.75
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08 Feb 2024

Project Management	\$137.00	\$890.50	6.50
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09 Feb 2024

Project Management	\$137.00	\$274.00	2.00
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11 Feb 2024

Project Management	\$137.00	\$274.00	2.00
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12 Feb 2024

Project Management	\$137.00	\$650.75	4.75
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19 Feb 2024

Project Management	\$137.00	\$137.00	1.00
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21 Feb 2024

Project Management	\$137.00	\$137.00	1.00
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22 Feb 2024

Project Management	\$137.00	\$274.00	2.00
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28 Feb 2024

Project Management	\$137.00	\$513.75	3.75
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29 Feb 2024

Project Management	\$137.00	\$205.50	1.50
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01 Mar 2024

Project Management	\$137.00	\$582.25	4.25
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04 Mar 2024

Project Management	\$137.00	\$548.00	4.00
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06 Mar 2024

Project Management	\$137.00	\$239.75	1.75
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07 Mar 2024

Project Management	\$137.00	\$719.25	5.25
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12 Mar 2024

Project Management	\$137.00	\$137.00	1.00
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13 Mar 2024

Project Management	\$137.00	\$171.25	1.25
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14 Mar 2024

Project Management	\$137.00	\$102.75	0.75
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18 Mar 2024

Project Management	\$137.00	\$479.50	3.50
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19 Mar 2024

Project Management	\$137.00	\$582.25	4.25
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20 Mar 2024

Project Management	\$137.00	\$616.50	4.50
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21 Mar 2024

Project Management	\$137.00	\$1,000.10	7.30
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22 Mar 2024

Project Management	\$137.00	\$993.25	7.25
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23 Mar 2024

Project Management	\$137.00	\$856.25	6.25
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24 Mar 2024

Project Management	\$137.00	\$787.75	5.75
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25 Mar 2024

Project Management	\$137.00	\$993.25	7.25
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26 Mar 2024

Project Management	\$137.00	\$685.00	5.00
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27 Mar 2024

Project Management	\$137.00	\$205.50	1.50
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Project Management	\$137.00	\$650.75	4.75
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Seth Jones	49793	246.50	
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08 Jan 2024

Project Management	\$202.00	\$909.00	4.50
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09 Jan 2024

Project Management	\$202.00	\$1,262.50	6.25
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10 Jan 2024

Project Management	\$202.00	\$808.00	4.00
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12 Jan 2024

Project Management	\$202.00	\$606.00	3.00
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14 Jan 2024

Project Management	\$202.00	\$101.00	0.50
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15 Jan 2024

Project Management	\$202.00	\$101.00	0.50
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16 Jan 2024

Project Management	\$202.00	\$808.00	4.00
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17 Jan 2024

Project Management	\$202.00	\$1,262.50	6.25
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18 Jan 2024

Project Management	\$202.00	\$909.00	4.50
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20 Jan 2024

Project Management	\$202.00	\$353.50	1.75
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21 Jan 2024

Project Management	\$202.00	\$202.00	1.00
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22 Jan 2024

Project Management	\$202.00	\$1,010.00	5.00
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24 Jan 2024

Project Management	\$202.00	\$606.00	3.00
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25 Jan 2024

Project Management	\$202.00	\$404.00	2.00
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26 Jan 2024

Project Management	\$202.00	\$555.50	2.75
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27 Jan 2024

Project Management	\$202.00	\$404.00	2.00
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28 Jan 2024

Project Management	\$202.00	\$404.00	2.00
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30 Jan 2024

Project Management	\$202.00	\$2,323.00	11.50
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31 Jan 2024

Project Management	\$202.00	\$1,818.00	9.00
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01 Feb 2024

Project Management	\$202.00	\$1,818.00	9.00
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02 Feb 2024

Project Management	\$202.00	\$1,616.00	8.00
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03 Feb 2024

Project Management	\$202.00	\$1,464.50	7.25
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04 Feb 2024

Project Management	\$202.00	\$1,363.50	6.75
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05 Feb 2024

Project Management	\$202.00	\$2,474.50	12.25
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06 Feb 2024

Project Management	\$202.00	\$2,222.00	11.00
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07 Feb 2024

Project Management	\$202.00	\$1,515.00	7.50
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08 Feb 2024

Project Management	\$202.00	\$1,212.00	6.00
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09 Feb 2024

Project Management	\$202.00	\$757.50	3.75
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10 Feb 2024

Project Management	\$202.00	\$404.00	2.00
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11 Feb 2024

Project Management	\$202.00	\$404.00	2.00
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12 Feb 2024

Project Management	\$202.00	\$50.50	0.25
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14 Feb 2024

Project Management	\$202.00	\$50.50	0.25
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15 Feb 2024

Project Management	\$202.00	\$303.00	1.50
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16 Feb 2024

Project Management	\$202.00	\$404.00	2.00
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17 Feb 2024

Project Management	\$202.00	\$50.50	0.25
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18 Feb 2024

Project Management	\$202.00	\$2,424.00	12.00
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21 Feb 2024

Project Management	\$202.00	\$707.00	3.50
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22 Feb 2024

Project Management	\$202.00	\$404.00	2.00
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28 Feb 2024

Project Management	\$202.00	\$858.50	4.25
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29 Feb 2024

Project Management	\$202.00	\$606.00	3.00
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07 Mar 2024

Project Management	\$202.00	\$404.00	2.00
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08 Mar 2024

Project Management	\$202.00	\$606.00	3.00
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11 Mar 2024

Project Management	\$202.00	\$101.00	0.50
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12 Mar 2024

Project Management	\$202.00	\$404.00	2.00
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13 Mar 2024

Project Management	\$202.00	\$1,010.00	5.00
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19 Mar 2024

Project Management	\$202.00	\$1,414.00	7.00
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20 Mar 2024

Project Management	\$202.00	\$1,060.50	5.25
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21 Mar 2024

Project Management	\$202.00	\$1,616.00	8.00
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22 Mar 2024

Project Management	\$202.00	\$707.00	3.50
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23 Mar 2024

Project Management	\$202.00	\$454.50	2.25
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24 Mar 2024

Project Management	\$202.00	\$959.50	4.75
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25 Mar 2024

Project Management	\$202.00	\$1,616.00	8.00
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26 Mar 2024

Project Management	\$202.00	\$1,262.50	6.25
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27 Mar 2024

Project Management	\$202.00	\$707.00	3.50
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